

EXHIBIT 5

UNITED STATES DISTRICT COURT
FOR THE
SOUTHERN DISTRICT OF NEW YORK

CLAUDINNE FELICIANO,)
Plaintiff,) Civil Action No.
vs.) 1:17-CV-5507 (AKH)
CORELOGIC RENTAL PROPERTY)
SOLUTIONS, LLC,)
Defendants.)
- - - - -)

DEPOSITION OF JEREMY HARRISON
New York, New York
Thursday, December 20, 2018

Reported by:
LEONORA L. WALKER
JOB NO. 151839

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2 background screening reports from Safe Rent?

3 A Yes. That is my understanding.

4 Q Okay. All right. I want to show you
5 another document. We will talk about this in more
6 depth later.

7 MR. ST. GEORGE: If I can have the court
8 reporter pull out from the stack of papers that
9 have been provided, the documents that are
10 Bates labeled 16 through 24, and hand those to
11 the witness and mark that as Exhibit 3.

12 (Whereupon Exhibit 3 was marked for
13 identification on this day.)

14 Q Mr. Harrison, do you recognize this
15 document?

16 A I do.

17 Q Again, I will represent to you this was
18 a document that was produced to us by Related in
19 response to the subpoena.

20 What do you understand this document to
21 be?

22 A This is a risk assessment score that is
23 received from CoreLogic -- Safe Rent.

24 Q And when you say "risk assessment
25 score," are you referring to what is reflected on this

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2 page as the lease decision "declined," and then there
3 is a hyphen, and then it says "505"?

4 A Yes, that is.

5 Q Okay. And what do you understand this
6 lease decision score to be?

7 A So this -- my understanding is that this
8 is a composite of a risk model.

9 Q Okay. So if I can understand you
10 correctly, this is a score that is generated by
11 CoreLogic that is meant to assess the applicant's risk
12 to Hunter's Point?

13 A Yes, that is accurate.

14 Q Okay. When you say "risk," what do you
15 mean by that? What type of risk?

16 A Based on a number of factors, income to
17 debt, negative lines of credit history, evaluating if
18 there is current bankruptcy, and unsettled negative
19 lines of credit, judgments, or tax liens.

20 Q Okay. It looks like there is a range of
21 scores here. If I look under the lease decision
22 decline, and I see the number 200, and then I see it
23 going up to the number of 800. Do you see that?

24 A I do.

25 Q Do you have an understanding of what

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2 that range represents?

3 A Yes.

4 Q And what is that?

5 A Anything under a score of 550 and below
6 is an automatic rejection; 550 to 599 would be a
7 conditional approval. Anything over 600 would be
8 automatic approved.

9 Q Okay. Do you know who set those
10 parameters for decline, conditional approval, or
11 acceptance? Was it Safe Rent or Related Management?

12 A Related Management sets the scores. The
13 algorithm was set by CoreLogic.

14 Q Looking at this document, does this
15 lease decision pertain to any particular applicant?

16 A It pertains to Claudinne Feliciano.

17 Q Okay. And can you tell what her score
18 is from this piece of paper?

19 A Yes, I can.

20 Q What is it?

21 A 505.

22 Q Based on your testimony, would a 505
23 score fall within decline range?

24 A Yes, it would.

25 Q Okay. Do you have an understanding of

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2 was a template that was generated by CoreLogic. Did
3 Hunter's Point make use of these templates and send out
4 these templates to the applicant?

5 A We did not.

6 Q It's just there in case Hunter's Point
7 did not actually use these adverse action letters?

8 A That is correct.

9 Q This -- just taking the document as a
10 whole, Related 16 through Related 24, after a request
11 for background screening was submitted to Safe Rent,
12 how long would it take to receive this information back
13 from Safe Rent?

14 A It would be immediate.

15 Q So it's fair to say this was an
16 electronic process?

17 A Yes.

18 Q Okay. And was the speed with which this
19 information was delivered back to Hunter's Point, was
20 that an important consideration for Hunter's Point in
21 determining Safe Rent as the background screen
22 provider?

23 MR. FISHMAN: Objection.

24 A That I don't know if that was the reason
25 for us using Safe Rent.

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2 Q And for this applicant, Ms. Feliciano,
3 it appears the last box is checked. Do you see that?

4 A I do.

5 Q Okay. "Credit reports received for
6 adult household members raise doubt about the ability
7 to make consistent and timely rent payments based upon
8 a composite score calculated." Do you see that?

9 A Yes.

10 Q Do you have an understanding of what
11 that phrase means?

12 A Yes.

13 Q What does that mean?

14 A That is referring to the lease decision
15 505 score.

16 Q So if this box is checked it's because
17 the lease decision score fell within the decline range
18 for the applicant?

19 A That is correct.

20 Q And this box can be checked in
21 conjunction with up to six additional other boxes on
22 this letter, correct?

23 A Yes.

24 Q But only one box has to be checked --
25 let me rephrase it.

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2 Q I believe you testified a minute ago
3 that it's your understanding that the score model
4 includes the mere fact that somebody was sued by a
5 landlord in a housing court case regardless of what
6 happened?

7 A Yes, but I don't know how that's
8 factored in though.

9 Q You don't know if it's given a lot of
10 weight, a little bit of weight, something in between?

11 A That is correct.

12 Q You don't know that?

13 A I don't know.

14 Q It's your understanding that's not
15 something that Related knows either, correct?

16 A That's correct.

17 Q So it's fair to say then that this 505
18 score -- because on page 21 of Exhibit 3, which
19 references a landlord-tenant court file case or a case
20 that was found about the applicant, that that
21 information went into the calculation of the score of
22 505?

23 A I believe so.

24 MR. ST. GEORGE: Object to the form.

25 Q And so is it fair to say then that the